

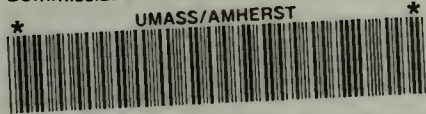
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Commonwealth of Massachusetts
Executive Office of Environmental Affairs

**Department of
Environmental Protection**

Daniel S. Greenbaum
Commissioner



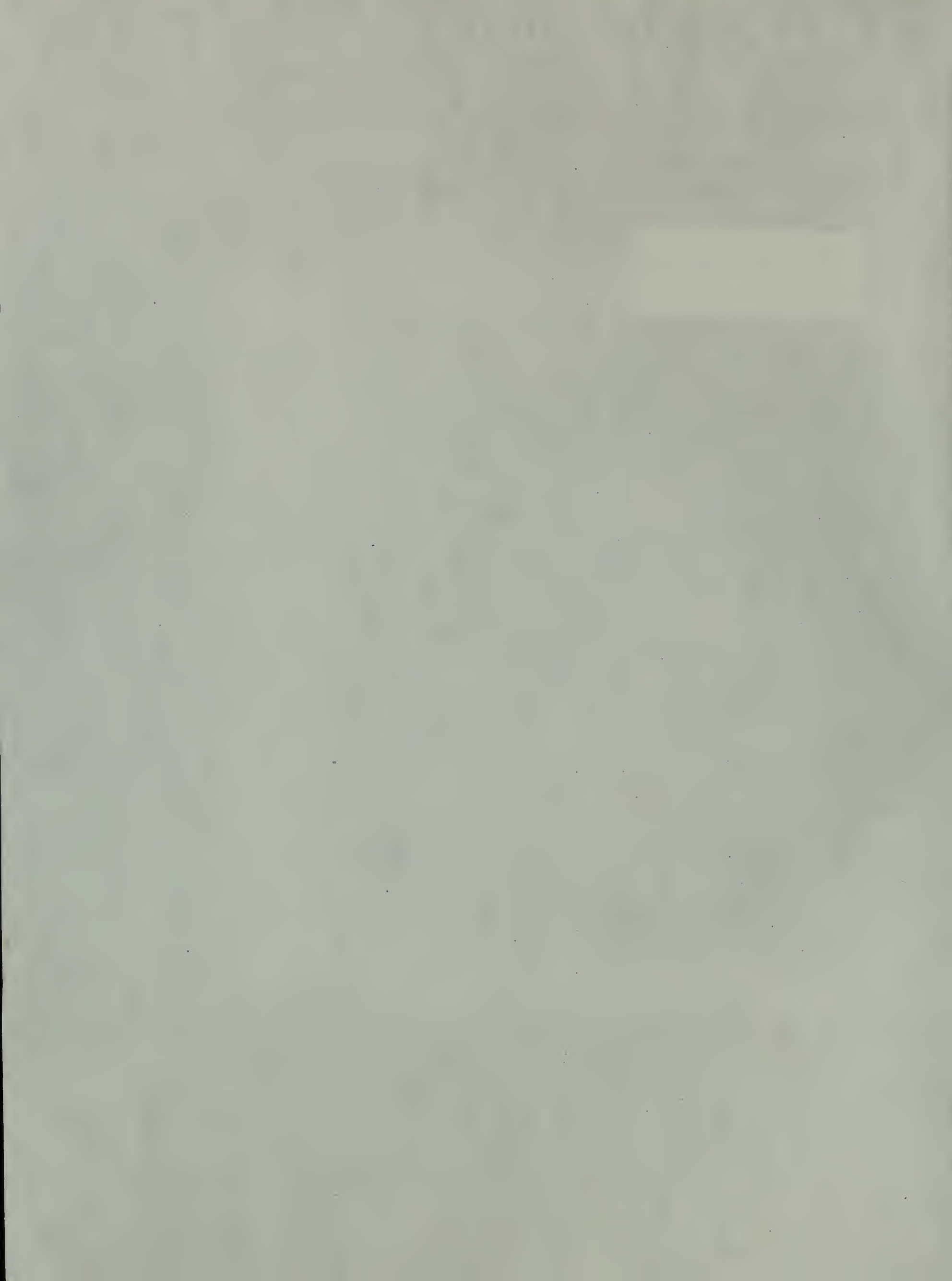
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Bureau of Waste Site Cleanup

Public Involvement Plan Interim Guidance
For Waiver Sites

January 1991

Interim Policy # WSC-800-90



PUBLIC INVOLVEMENT PLAN INTERIM GUIDANCE DOCUMENT
FOR WAIVER SITES

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INTRODUCTION

Under the Massachusetts "Superfund" Law (M.G.L. c. 21E), the Massachusetts Department of Environmental Protection (DEP, formerly the Massachusetts Department of Environmental Quality Engineering or DEQE) is responsible for overseeing remedial response actions at sites at which oil or hazardous materials have been released to the environment. The remedial response action process is established by the Massachusetts Contingency Plan (310 CMR 40.00), referred to as the MCP.

Under the MCP, DEP provides an opportunity for Potentially Responsible Parties (PRPs) and other parties at sites designated as non-priority sites, under certain conditions, to proceed through the remedial response action process on an accelerated schedule by waiving the five DEP approvals required in the MCP. These sites are referred to as waiver sites. Sites which are granted waivers are still subject to all the other requirements in M.G.L. c. 21E and the MCP, including public involvement.

The MCP (310 CMR 40.200) requires that public involvement be undertaken during the remedial response action process to ensure that the public is both informed of and involved in planning for remedial response actions. DEP designates a disposal site as a Public Involvement Plan (PIP) site if the public indicates an interest in becoming involved in the remedial response action process. (The designation of a site as a PIP site may occur at any time throughout the remedial response action process). DEP requires the development and implementation of site-specific Public Involvement Plans at all PIP sites. At waiver sites, DEP may choose to assign the preparation and implementation of the Plan to the site PRP(s). PRPs must implement and adhere to Plans at PIP sites. In some cases, a Plan will have been prepared prior to the site's designation as a waiver site. Should this occur, DEP may assign the PRP the responsibility of implementing the existing Plan.

DEP developed this Public Involvement Plan guidance document to provide step-by-step instruction to PRPs at PIP waiver sites. This guidance will ensure that PRPs conduct public involvement activities in accordance with MCP requirements, including developing and implementing a site-specific Public Involvement Plan.

The Plan identifies for community members the specific opportunities for public participation in cleanup decisions that will take place, when advance notice of site activities will be provided, and when information about site investigations will be available. The Plan identifies community concerns and describes activities that will be undertaken to address and incorporate public concerns in the remedial response process.

The public involvement process for waiver sites is briefly summarized below.

1. DEP receives a public involvement petition for a waiver site.
2. DEP informs the PRP that they must develop and implement a Public Involvement Plan.
3. DEP responds to the petitioners.
4. The PRP conducts community interviews.
5. The PRP prepares a draft Public Involvement Plan.
6. The PRP presents the draft Plan at a public meeting, along with an update on the status of the site.
7. The PRP finalizes the Plan.
8. The PRP implements the final Plan and revises it, if necessary.

For more information on public involvement at waiver sites, please contact the DEP Public Participation Branch, Bureau of Waste Site Cleanup, One Winter Street, Boston, Massachusetts 02108 (telephone 617-292-5578).

How to Use this Document

This document has been prepared to assist PRPs in implementing MCP public involvement requirements at PIP sites. The document contains the following sections:

I. PUBLIC INVOLVEMENT PLAN GUIDANCE MANUAL:

- A. The Public Involvement Plan Process: What PRPs must do at PIP sites, including steps that must be followed to draft and finalize the Plan.
- B. Developing the Public Involvement Plan: Step-by-step instruction on how to prepare the draft Plan.

II. MODEL PUBLIC INVOLVEMENT PLAN: A model that must be used when developing the draft Plan.

III. PUBLIC INVOLVEMENT ACTIVITIES AND TECHNIQUES: Examples of additional activities that may be undertaken to address community concerns at PIP sites.

IV. COMMUNITY INTERVIEW PROTOCOL: Directions for conducting community interviews to identify community concerns to be addressed in the Plan.

I. PUBLIC INVOLVEMENT PLAN GUIDANCE MANUAL

I. PUBLIC INVOLVEMENT PLAN GUIDANCE MANUAL

The Public Involvement Plan Guidance Manual is organized in two sections: A) the Public Involvement Plan Process; and B) Developing the Public Involvement Plan. These two sections are presented below.

A. The Public Involvement Plan Process

At PIP waiver sites where DEP has assigned the responsibility of preparing a Plan to the PRP, the PRP must develop a draft Plan and present the Plan for public review and comment. After public comments are incorporated, the PRP will develop a final Plan.

1. Requirements for Plans

The MCP regulations (40.203 (e) 1-10) state that, at a minimum, the Plan must ensure that:

- a. Local concerns and sources of information are identified so that the Plan reflects the nature and level of public interest;
- b. Methods for informing the public about the remedial response action, including proposed remedial response alternatives, are provided;
- c. Sufficient public notice is provided about specific milestones in the remedial response action;
- d. Access to public records concerning the remedial response action is provided;
- e. Opportunities are provided to comment on the remedial response action process;
- f. Public involvement activities are undertaken throughout the remedial response action and that a schedule is developed for conducting these activities;
- g. Procedures for public involvement in a short term measure are provided;
- h. Procedures are established for notifying the public in advance about field work at the disposal site which involves the use of heavy construction equipment or protective clothing (Level A & B, as defined by "Standard Operating Safety Guides" published by EPA);
- i. One or more local information repositories are established; and

- j. A mailing list is established of individuals who express interest in receiving information about the disposal site.

2. Procedures to Develop and Complete the Draft and Final Public Involvement Plan

After DEP designates the site as a PIP site, the following activities must take place:

- a. Identification of community concerns using the interview protocol in Section IV.
- b. Preparation of a draft Plan, based on this guidance manual, which describes: site, environmental assessment, and public involvement histories; concerns relative to the site; proposed activities to address those community concerns; and, opportunities for public input in decisions regarding remedial actions at the site. Once a petition is received for a site that has been granted a waiver, a draft Plan must be developed within **thirty (30)** days. A copy of the draft Plan must be sent to DEP.
- c. Development of a site mailing list and the mailing of a notice of the public meeting on the draft Plan. The meeting should be held at a time and location convenient to the public. A copy of the notice must be sent to DEP.
- d. Presentation of the draft Plan, along with an update on the status of the site, at a public meeting; distribution of copies of the draft Plan at the meeting and the availability of sign-in sheets for meeting attendees.
- e. Preparation of meeting minutes that include specific comments received on the Plan at the public meeting. A copy of the meeting minutes and comments must be sent to DEP.
- f. Establishment of a minimum 20 calendar day public comment period to provide an opportunity for public review and input on the draft Plan.
- g. Review of comments submitted and incorporation of relevant and reasonable comments into the Plan. A copy of the final Plan must be sent to DEP.
- h. Preparation of a Response Summary listing each comment received on the draft Plan, noting comments that have been incorporated into the Plan and

providing an explanation of why other comments have not been incorporated. A copy of the Response Summary must be sent to DEP.

- i. Placement of this document ("Public Involvement Plan Interim Guidance for Waiver Sites"), the draft Plan, meeting minutes, Response Summary, and final Plan in local information repositories.
- j. Sending a notice of document availability to the site mailing list announcing the placement of these documents in the site information repository. DEP must be included on the site mailing list.
- k. Implementation of the final Plan throughout the remedial process, and modifications to the final Plan as needed.

3. General Guidelines for Developing the Public Involvement Plan

Plans are tailored to the specific conditions presented by individual sites. While DEP requires that certain activities be conducted at all PIP sites, the specific activities at each site must reflect the needs of the particular site community. Section III describes public involvement activities that, while not required, may be useful and appropriate at particular sites. A public involvement program must address site-specific needs and concerns, meet the public involvement requirements of the MCP, and reflect the level of remedial activity at the site.

In some instances, a disposal site will be located in more than one community and/or affect more than one community. If this is the case, the Plan must be tailored to the concerns of all affected communities. This will require that PRPs solicit information and concerns from all affected communities and that, if requested during community interviews, information repositories be established in each of the affected communities.

The Plan must be written in a simple, straightforward manner so that it is easily understood by the general public.

Two activities must be undertaken by the PRP to begin developing the Plan for a specific site:

a. Collecting Background Information

The Plan contains historical information about the site so that the reader will have an historical

perspective of site events. This information must include: a site description and history, an environmental assessment history, and a history of public involvement at the site.

There are many potential sources of background information; some sources are listed below.

- Massachusetts DEP - Boston and regional office files.
- U.S. Environmental Protection Agency, Region I - Boston office files.
- Local government agencies - including files from the Board of Health, Conservation Commission, Department of Public Works, and other agencies.
- Local and regional newspapers.
- Interested and affected residents.

b. Conducting Community Interviews

The PRP must conduct interviews to identify community concerns. The interview process presents an opportunity to obtain information and feedback from community members. It allows the PRP to initiate a dialogue with the community and should establish opportunities for future working relationships. Concerns expressed by community members provide the foundation for determining appropriate public involvement activities to be proposed in the draft Plan. Concerns must also be factored into assessment and remediation activities.

The list below suggests people or organizations who might be contacted for community interviews. DEP requires an interview with community members, or their designees, from categories marked with an asterisk (*).

- Key petitioner (the person signing the petition cover letter, the first name on the petition, or the person designated as such elsewhere)*
- Chief Municipal Official (Chairman of the Board of Selectmen, Town Manager or Mayor)*
- Board of Health (Chairman)*

- Conservation Commission, if wetlands are involved (Chairman)*
- Department of Public Works
- Hazardous Waste Coordinator
- Fire Chief
- Site abutters
- Community organizations (Chamber of Commerce, League of Women Voters, Rotary Club, citizen groups)
- Environmental organizations
- Neighborhood representatives, including school and business officials, local residents
- Others recommended during interviews

Section IV presents a protocol for conducting community interviews. Meetings with individuals often produce the most useful and honest answers. However, interviews may be conducted in small-group settings or by telephone. The results of community interviews must be presented in Exhibit I of Section 2.3 of the Plan. Specific concerns should be presented in bullet format under the appropriate heading. The name and affiliation of people expressing concerns should not be included in the Plan, and the number of people expressing each concern should also be omitted. Each concern, regardless of who expressed it and the number of times it was expressed, should be treated with equal weight. If individuals were contacted but did not respond or did not wish to be interviewed, document that fact for the file.

B. Developing the Public Involvement Plan

The following pages provide an outline of a Public Involvement Plan. The outline contains brief descriptions and explanations of each section of the Plan and offers information about how to prepare the draft Plan.

This outline should be referred to in conjunction with the model Public Involvement Plan presented in Section II. The model Plan presents the required language that must be included in all Plans. The model also includes examples of narratives that may be used in the Plan, if appropriate. The PRP must refer to this guidance manual and the model Plan when developing a draft Plan.

THE PUBLIC INVOLVEMENT PLAN

1.0 INTRODUCTION

The Introduction to the Public Involvement Plan describes the remedial response action process and the public involvement process required in the MCP for disposal sites. This section states that the PRP¹ will carry out the activities set forth in the Plan, identifies the PRP and contact person(s) available to discuss the Plan, and provides the date and location of the public meeting at which the PRP will present the draft Plan to the site community and provide an update on the status of the site.

2.0 SITE BACKGROUND

This section is composed of three parts:

1. Site Description and History
2. Environmental Assessment History
3. Public Involvement History

Much of this information is contained in the waiver application. Where appropriate and relevant, information from the waiver application can be presented in the Plan. It should be presented in simple, easy-to-read language.

2.1 Site Description and History

This subsection provides a description of the site location and the specific site features; a map noting key site features should be included. This subsection describes current and past activities at the site. Specific hazardous materials uses and releases are also listed in this subsection.

¹ Section I (the guidance manual) and Section II (the model Plan) make reference to only one PRP for a site. However, there are sites with more than one PRP, or party(ies) other than the PRP, performing remedial and/or public involvement activities at the site. For those sites, the Plan must identify and refer to all PRPs and must clarify the roles and responsibilities of each PRP. The Plan must include information about the responsibilities and activities being carried out by each PRP as appropriate throughout the draft Plan.

The Plan must provide at least the information listed below:

- o Site Description: size of site (number of acres); location (address and town); reference to adjacent properties specifying type of land use (residential, commercial or industrial); description of key areas to the north, south, east, and west of site; characteristics of site (buildings, roads, wetlands, ponds, and others).
- o Chronology of site uses and ownership: including site activities; specify types, volume and uses of oil/hazardous materials handled on-site; and dates of operation.
- o Description and dates of known hazardous materials releases.

2.2 Environmental Assessment History

This subsection provides the reader with an historical overview of enforcement actions and remedial response actions that occurred at the site to date. It describes the results of each action or investigation, what contaminants were found at the site, and what materials may remain on- or off-site. This subsection identifies various parties involved in and specifies who is responsible for these actions, including: DEP, municipal officials and/or departments, PRPs and their consultants.

The environmental assessment history section should provide information on the following actions in chronological order, and provide the date when each took place. A complete environmental assessment history must be provided. Include information on the following actions:

- o Phase reports (including descriptive title of Phase) completed and submitted to DEP;
- o Notice of Responsibility letter sent by DEP;
- o Site investigations conducted including types of media sampled and analyzed, findings of site investigations, sampling, and other environmental assessments;
- o Waiver Application Section III parts 2, 3, 4, 5 b-h (indicating that this information was provided in the Waiver Application and may be preliminary), and 7;
- o Date the Waiver was granted; and
- o Any additional cleanup/response actions taken prior to submission of Public Involvement Plan petition.

It should be noted that, although the Plan outlines the complete environmental assessment history, opportunities for public involvement activities do not extend to activities or response actions that have been completed at the site prior to receipt of a petition for public involvement.

This section of the Plan should also specifically state at what phase of the remedial response process the site is currently in.

2.3 Public Involvement History

This subsection briefly describes past public activities and concerns regarding the site such as meetings or contact with local officials. It states when the public first indicated concern regarding the site and describes the nature of concerns to date. It provides an overview of actions taken by the public regarding the site including petitioning DEP to obtain PIP-site designation. Section 2.3 of the model Plan includes Exhibit I, where a list of community concerns must be presented.

Provide the following information (in chronological order, if possible):

- o Names of organizations that have been involved in site activities, the date organizations were formed (particularly if the group was established specifically to address site-related issues);
- o Types of public involvement activities conducted by involved organizations (public meetings, hearings, newsletters, petitions); focus of concerns (site cleanup decisions, public health, public safety, risk to the environment); dates of significant events or actions such as meetings, studies, and petitions;
- o Date and contents of PIP petition and the name of the petitioning organization if one exists;
- o Meetings held with local officials or citizens regarding response actions at the site;
- o Dates and descriptions of PRP activities conducted to provide information or offer opportunities for public involvement to community/site-area residents;
- o Date when community interviews were conducted, including identifying organizations/entities represented by those interviewed; and
- o Summary of community concerns identified during interviews by categories relating to phases of the remedial process.

3.0 ADDRESSING PUBLIC CONCERNS

This section contains required language describing how public involvement activities will be conducted during the remedial action.

4.0 PUBLIC INVOLVEMENT ACTIVITIES

This section presents public involvement activities that will be conducted at the site. Activities are presented in two categories: Informing the Public and Soliciting Public Input.

INFORMING THE PUBLIC

4.1 Establish a Local Information Repository

The PRP must identify a location or locations, based on information and suggestions gathered during the community interviews, where files containing site information and reports can be established and maintained. In addition, the information repository must contain a copy of the site waiver application as submitted to DEP, a copy of the letter from DEP granting the waiver, and a copy of this document ("Public Involvement Plan Interim Guidance for Waiver Sites"). The location must be easily accessible to the public; open during regular business hours and some evening and weekend hours, if possible; and secure so that materials will not be lost or misplaced. Public libraries are most often used as local information repositories. Municipal offices or a local residence may also be used if the community and the proposed repository agree.

If more than one community is involved, information repositories may be established in each community, if requested during community interviews. The repository locations must be listed in the Plan. A complete copy of the site files will also be maintained in the DEP regional office.

4.2 Establish and Maintain a Site Mailing List

The PRP must establish, maintain and update a site mailing list of members of the public and local news media interested in receiving site information and notification of the availability of site documents. The site mailing list must include all petitioners and other individuals and organizations who have requested information about the site, or, who by the nature of their work (i.e. Fire Chief, Health Agent) should be kept informed about site activities. The PRP must ensure a method for adding names to the site mailing

list. Names from sign-up sheets at any site-related public meetings must be added to the mailing list. The PRP contact person must be listed on all documents and notices issued by the PRP so that interested parties can call or write to have their names added to the mailing list. DEP must also be on the mailing list so that the regional file is kept updated.

4.3 Notification of Major Milestones and Events

The PRP must provide advance notification of major milestones and events during response actions to specific members of the public whose names are compiled on a "Notification List." The model Plan lists the major milestones for which notification is required and provides a list of people who must be on the list. The PRP must request permission from individuals prior to including them on the Notification List. Written notifications should be copied to DEP.

4.4 Other Public Involvement Activities

If appropriate, indicate the public involvement activities described in Section III of this document or any other activities that will be conducted to provide information to the public.

SOLICITING PUBLIC INPUT

4.1 Public Comment Periods

Public comment periods allow the public to review and comment on the PRP's proposed course of action. PRPs must factor relevant and reasonable comments into remedial response activities prior to implementation of the activity. The PRP must hold a public comment period on those documents which would have required DEP approval: the Phase II (Comprehensive Site Assessment) scope of work; the Phase II report; the Phase III report (Final Remedial Response Plan); the Phase IV report (Remedial Response Implementation Plan); and on all proposals for Short Term or Interim Measures.

Each public comment period must last a minimum of 20 calendar days, with the possible exception of Short Term Measures. DEP must be notified immediately of the existence of an imminent hazard and the intention to perform a Short Term Measure. If the nature of the imminent hazard dictates that a Short Term Measure be performed immediately (subject to DEP's review and concurrence), the 20 calendar day public comment period may be reduced or waived. Public comment periods may also be longer than 20 calendar days if warranted by the complexity and length of the report, or if the public expresses a need for additional comment time.

4.2 Response to Comments

Response summaries contain a formal record of all comments received during the public comment period and provide PRP responses to each comment. Comments that have been incorporated should be noted and an explanation of those that have not been incorporated. Responses should be as detailed as possible. The PRP must develop a Response Summary at the conclusion of each public comment period and distribute copies of the summary to all parties who submit comments, the information repository(ies), and the DEP site file. A notice of the availability of the Response Summary must be sent to the site mailing list. The Response Summary must be made available to the public before taking the remedial response action submitted for comment, or prior to moving to the next MCP phase.

4.3 Public Meetings

Public meetings provide opportunities for discussion of major site activities. At a minimum, the PRP must conduct a public meeting to present the draft Public Involvement Plan and begin soliciting comments on the draft Plan. Additional public meetings should be held if requested during community interviews or at any other time during the remedial response action process. Public meetings should be held prior to beginning a public comment period; this allows time for questions and discussion on the document and ensures the public an opportunity to be better prepared to provide comments. Public meetings must take place at locations and times convenient to the public. Minutes should be taken at the meetings and placed in the information repository(ies) and copied to DEP.

4.4 Other Public Involvement Activities

If appropriate, indicate the public involvement activities described in Section III of this document or any other activities that will be conducted to solicit input from the public.

5.0 SCHEDULE FOR PUBLIC INVOLVEMENT ACTIVITIES

The PRP must provide a schedule for all public involvement activities listed in Section 4.0. This schedule must be presented in the context of the remedial response schedule for the site. The schedule must specify the points in the response action at which particular public involvement activities will be conducted.

Section 5.0 of the model Plan includes Exhibit II, where a sample schedule for the public involvement activities described in the Plan must be presented.

6.0 RESPONSIBILITY FOR IMPLEMENTING THE PUBLIC INVOLVEMENT PLAN

This section states that the PRP is responsible for carrying out public involvement activities at the site. This section also contains information about the process that DEP has established to address situations in which the agency receives complaints about the manner in which the public involvement process is being developed or implemented by the PRP.

7.0 REVISIONS TO THIS PLAN

This section describes how the Public Involvement Plan may be revised during the remedial response action process.

II. MODEL PUBLIC INVOLVEMENT PLAN

DRAFT
PUBLIC INVOLVEMENT PLAN

(Name) Disposal Site
(DEP Site Number)
(Address, Town)

1.0 INTRODUCTION

On (date), the Massachusetts Department of Environmental Protection (DEP, formerly the Department of Environmental Quality Engineering or DEQE) received a petition from (name of petitioners group, name of town). The petition requested that the (name) disposal site be designated as a Public Involvement Plan (PIP) site, under Section 14 (b) of Massachusetts General Laws chapter 21E (M.G.L. c. 21E), the State "Superfund" Law. On (date), DEP officially designated the (name) disposal site as a PIP site, requiring the preparation and implementation of a Public Involvement Plan.

This Plan has been prepared by (PRPs) in accordance with the requirements of the Massachusetts Contingency Plan (MCP), 310 CMR 40.00. The (name) disposal site is a waiver site. DEP has assigned responsibility for conducting both technical and public involvement activities at the (name) disposal site to (PRP). Sites which are granted waivers are still subject to all of the other requirements in M.G.L. c. 21E and the MCP, including public involvement. DEP retains the authority to ensure that public involvement activities are conducted in accordance with state law and regulations.

Under M.G.L. c. 21E, DEP is responsible for overseeing remedial response actions at sites at which oil or hazardous materials have been released to the environment. Remedial response actions include determining the nature, source and extent of the contamination; risk posed by the site; whether cleanup actions are necessary and if necessary, determining and implementing the most appropriate actions. In addition, the remedial response action process provides opportunities for public involvement throughout the process. The remedial response action process is established by the MCP.

Public involvement during the remedial response action process is undertaken to ensure that the public is both informed of and involved in planning for remedial response actions. For disposal sites at which the public indicates interest in becoming involved in this process, DEP designates the site as a PIP site, and requires the preparation of a plan which identifies specific activities that will be undertaken to address public concerns to the extent possible. Due to public concerns about the (name) disposal site, DEP has designated the site a PIP site, pursuant to the MCP.

This draft Public Involvement Plan has been prepared by (PRP) and will be reviewed by the public and revised based on comments submitted. The final Plan will be implemented in conjunction with the development and implementation of remedial response actions for the disposal site. The (PRP) will implement public involvement activities at the (name) disposal site.

This document is the proposed Public Involvement Plan for the (name) disposal located at (site address and town). Section 2 contains background information on the site; including site, environmental assessment, and public involvement histories. Section 3 explains how the remedial response action process addresses community concerns which have been raised during the development of the Plan. Section 4 explains the proposed public involvement activities. Section 5 contains a schedule for public involvement activities. Section 6 outlines the roles and responsibilities of those involved in implementing the Public Involvement Plan. It also explains the procedures DEP will use to address situations in which the agency receives complaints about the manner in which the Plan is being implemented. Section 7 describes how the Plan will be revised in the future.

This draft Plan will be presented by (PRP) at a public meeting on (day, date, and time) at the (meeting location and address). Comments on the draft Plan are encouraged and may be submitted at the meeting or by writing to (PRP public involvement contact name, mailing address, and phone number). Comments should be submitted by close of business, (date - weekday). [Allow at least 20 calendar days for the public comment period].

2.0 SITE BACKGROUND

2.1 Site Description and History

[Provide geographic and historical information about site and include site map. Refer to Section 2.1 of guidance manual.]

2.2 Environmental Assessment History

[Provide information about enforcement actions, response actions, and site investigations in chronological order. Include names of all PRPs if more than one, and specify which PRPs were responsible for specific actions at the site. Refer to Section 2.2 of guidance manual.]

2.3 Public Involvement History

[Provide information about past public activities related to the site, including the petitioning of DEP to obtain PIP site designation, and the nature of community concerns. Refer to Section 2.3 of guidance manual.]

On (date), DEP received a petition from (petitioners group) requesting that the (name) disposal site be designated a Public Involvement Plan (PIP) site, in accordance with M.G.L. c. 21E. On (date), DEP formally responded to the petition, designating the site as a PIP site, and authorizing (PRP) to develop a draft Plan and conduct public involvement activities at the site.

In developing this proposed Public Involvement Plan, (PRP) conducted interviews in (Month, year) with key officials and individuals interested in the site. Concerns identified are presented in Exhibit I.

3.0 ADDRESSING PUBLIC CONCERNS

The process for assessing and cleaning up disposal sites as set forth in the Massachusetts Contingency Plan (310 CMR 40.00), is designed to address the effects of the site on health, safety, public welfare, and the environment. Once a release of oil or hazardous materials has been confirmed at a disposal site (Phase I of the remedial response action process), the process proceeds to:

- o Comprehensive field investigation of the nature and extent of the contamination, and an evaluation of any risks posed to the public and the environment from the site (Phase II);
- o Identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a permanent cleanup at the site (Phase III); and
- o Implementation of the selected remedial response actions (Phase IV).

Physical work at a disposal site includes sampling and other environmental field testing, and the implementation of the selected response actions. It may also include the implementation of measures designed to stabilize conditions at the site to prevent the continued migration of contaminants or eliminate an imminent threat to public health, safety, welfare or the environment until planning for remedial response is underway (i.e., Interim or Short Term Measures).

At each step of the remedial response action process, plans for work are developed, the work is conducted, and reports describing results and recommendations for the next step are prepared. The documents which describe each of these steps are the cornerstone of the remedial response action planning process, since they provide the information necessary to make decisions about how a site should be cleaned up.

As noted in Exhibit I, the public has raised a number of concerns about the (name) disposal site. The remedial response action planning process is designed to address the concerns about the nature and extent of contamination; risks posed by the site to health, safety, public welfare, and the environment; and the adequacy of proposed cleanup measures. These concerns will primarily be addressed in Phases II and III of this process. For example, the assessment of off-site contamination is considered in Phase II, as is the impact of the disposal site on public health and the environment. Phase III will address the adequacy of proposed remedial response actions to provide permanent solutions for the contamination problems at this site.

[If applicable, add this paragraph.] The petitioners requested that DEP address other issues in addition to those relating to PIP-site designation and remedial response activities pertaining to the site. DEP has responded to these additional requests; a copy of DEP's response and additional information may be obtained by contacting the DEP Regional Office in (city, address, telephone number).

4.0 PUBLIC INVOLVEMENT ACTIVITIES

In accordance with the MCP (40.200), activities undertaken to involve the public in response actions serve two purposes:

- o to inform the public about the risks posed by the disposal site, the status of remedial response actions, and the opportunities for public involvement; and
- o to solicit the concerns of the public about the disposal site and remedial response actions so that, to the extent possible, these concerns can be addressed and incorporated in planning remedial response actions.

To meet each of these objectives, (PRP) proposes to undertake specific activities during the remedial response process at the (name) disposal site. These activities are described below.

INFORMING THE PUBLIC

The (PRP) will provide site-specific information to the public by establishing information repositories; developing and maintaining a site mailing list to distribute information about the site; and providing advance notification to local officials and residents about site activities. [If appropriate, add other activities that will be conducted to provide information to the public.]

4.1 Information Repositories

Publicly Available Site Files: A file on the (name) disposal site is maintained at the (region) Regional DEP Office. The file will contain all documents pertaining to the site with the exception of any enforcement-sensitive material. Appointments to view the site files can be made by contacting (Site Assessment File Review Contact Person at DEP Regional Office, address and phone number).

Local Information Repositories: The (PRP) will establish and maintain a local information repository to provide (site community) residents with easy access to information about the site cleanup process and results of site investigations. The site information repository will contain a complete copy of the DEP site file including: the waiver application; the letter from DEP granting waiver approval and conditions; the Public Involvement Plan Interim Guidance for Waiver Sites; work plans; sampling and field testing plans; technical reports and documents summarizing results and recommendations; relevant correspondence; press releases; public information materials; the Public Involvement Plan; public meeting summaries; summaries of responses to comments received; and copies of public notices about the disposal site. Information will be sent to the repository by (PRP) as it is developed.

The information repository for the (name) disposal site is located at:

Name of information repository
Address
Contact Person (if appropriate)
Phone Number
Hours

[Provide the above information for each repository if more than one repository is established].

4.2 Site Mailing List

The (PRP) will establish a mailing list for the (name) disposal site. The site mailing list will include: petitioners, interested residents, site abutters, local and regional news media, municipal officials (specifically the Chief Municipal Officer and the Chairperson of the Board of Health), state legislators, DEP site file, and anyone else indicating an interest in receiving information about the site. The mailing list will be used to announce upcoming public meetings, distribute fact sheets, notices of public comment periods on and the availability of documents in the information repositories, and any other information about the (name) disposal site. The (PRP) will maintain the mailing list and update it as necessary. The (PRP) will provide DEP with a copy of the site mailing list.

Anyone wishing to be added to the mailing list can call or write to:

- o (PRP Contact person, Address, Phone Number)

4.3 Notification to Local Officials and Residents of Major Milestones and Events

The Massachusetts Contingency Plan requires community notification of major planning and implementation milestones at disposal sites. Major milestones include: 1) the start of field work, related to response actions, involving heavy equipment or protective clothing (Level A or B protection); 2) the completion of each phase of the remediation process; and 3) the start of any Short Term Measures.

Notification of field work will include information on the type of work and its approximate duration. Notification will be made by (PRP) to the people on the Notification List by telephone the day before activity is scheduled to begin. Notification at the end of a remedial phase will include a summary of the phase report and information on where the report can be reviewed. Those to be notified include:

NOTIFICATION LIST

<u>Name</u>	<u>Affiliation</u>	<u>Address & Phone</u>
-------------	--------------------	----------------------------

(Chief Municipal Officer - Chairman of the Board of Selectmen, Town Manager, or Mayor)		
---	--	--

(Chairman of the Board of Health) (State Representative)		
---	--	--

(State Senator)		
-----------------	--	--

(Key petitioner/citizen contact)		
----------------------------------	--	--

[Add others if appropriate.]		
------------------------------	--	--

In addition, the (locality) Fire and Police Departments will be notified in situations where public safety is a concern.

[Include text for the following section if appropriate.]

4.4 Other Public Involvement Activities to Provide Information

SOLICITING PUBLIC INPUT

The (PRP) will provide opportunities for public input regarding site cleanup decisions by holding public comment periods to provide additional opportunities for oral and written input regarding site cleanup decisions and preparing summaries of all comments received during the public comment period and responses to them. [If appropriate, add other activities that will be conducted to solicit information from the public.]

4.1 Public Comment Periods

(PRP) will provide specific opportunities for the public to submit comments about documents concerning the site. When key documents are available in draft form, they will be provided to the information repositories, and a notice of their availability will be sent to the site mailing list. The notice will include the title of the document, where it is available for review, information about how to submit comments to (PRP), and the length of the public comment period. (PRP) will determine the length of the comment period, which will normally be 20 calendar days, but may be longer if warranted by the complexity of a particular document or if requested by the public. Comment periods for Short Term Measures may be reduced or eliminated (with DEP's review and concurrence) if the nature of the imminent hazard dictates that a Short Term Measure be performed immediately. (PRP) will be responsible for providing document copies to the information repositories and to the DEP site file, as well as sending out notices of availability of any documents it prepares.

Documents available for public comment will include:

- o the draft Public Involvement Plan;
- o Scopes of Work for the Comprehensive Site Assessment-Phase II;
- o reports summarizing the findings of the Comprehensive Site Assessment-Phase II;
- o the Final Remedial Response Plan (FRRP)-Phase III;
- o the Remedial Response Implementation Plan (RRIP)-Phase IV;
- o major plans concerning the operation and maintenance of response actions-Phase V; and
- o proposals for Short Term or Interim Measures.

4.2 Response to Comments

The (PRP) will prepare a summary of all comments received on each document available for public comment, and (PRP) responses to these comments. A copy of this response summary will be sent to all those who submitted comments and will be placed in the information repository and the DEP site file. (PRP) will also send a notice of availability of the response summary to the mailing list. The summary will be made available prior to (PRP) taking the remedial response action submitted for comment, or prior to moving to the next MCP phase.

[Include text for the following sections if appropriate.]

4.3 Public Meetings

The (PRP) will brief the public about the status of the (name) disposal site during the remedial action process. Meetings will take place at the following milestones: [list the points in the process when meetings will be held].

Meetings will serve two purposes: 1) to provide community officials and the general public with a progress report regarding remedial response actions at the site, and 2) to provide an opportunity for the public to question and comment on remedial action plans for the site.

(PRP) will send notices announcing public meetings to individuals on the site mailing list. (PRP) will prepare meeting summaries, submit the summaries to DEP, and place a copy of the summaries in the local information repository.

4.4 Other Public Involvement Activities to Solicit Input

5.0 SCHEDULE FOR PUBLIC INVOLVEMENT ACTIVITIES

Exhibit II provides a schedule of the public involvement activities listed in Section 4.0. The schedule specifies the milestones during the remedial response action when public involvement activities will be conducted.

6.0 RESPONSIBILITY FOR IMPLEMENTING THE PUBLIC INVOLVEMENT PLAN

The (name) disposal site has received a waiver from DEP and the (PRP) has been assigned responsibility for conducting both remedial and public involvement activities at this site. (PRP) has

developed this Public Involvement Plan and is responsible for carrying out the activities listed in this Plan during the site cleanup process. To ensure that Public Involvement Plans are implemented properly by PRPs, DEP has established an appeal process for handling disputes about public involvement activities at waiver sites. The appeal process is initiated when ten or more residents of the community in which the site is located or of a community potentially affected by the site submit a signed petition to the PRP and to DEP stating that the PRP is not implementing activities agreed upon in the final Public Involvement Plan. The petition must provide specific information documenting the PRP's failure to implement specific sections of the Plan.

Upon receipt of the appeal petition, the PRP must provide written confirmation of receipt to the petitioners and provide a copy of this letter to DEP. The PRP then has twenty calendar days to work with the petitioners to address their concerns. Within this twenty day period, the PRP must respond to the petition in writing, describing how each issue identified by the petition will be addressed. Any resulting changes in public involvement activities must be incorporated into the public involvement plan. A twenty day public comment period must then be held on the revised Plan, in accordance with Section 7 of this Plan. Any revisions to the Plan or specific responses to the appeal petition must be copied to DEP.

If the PRP and the petitioners cannot resolve the petitioners' concerns within twenty calendar days, the petitioners must each submit written information to DEP documenting their concerns, actions taken to date to resolve the issues, and their inability to resolve the issues independently of DEP. When DEP receives this information, it will take the following actions:

1. Review the information packages to assess specific petitioner complaints, identify other community concerns, and determine what public involvement activities, as specified in the Plan, have and have not been conducted. DEP may inspect local information repositories, review notification letters, and contact members of the Notification List.

2. Determine whether the PRP has made any efforts to address community issues. This may include a review of meeting summaries, correspondence or other formal attempts to resolve community concerns about insufficiencies in public involvement activities. If, based upon review of the appeal petition, DEP determines that the Public Involvement Plan is not being implemented, DEP may take one or more of the following actions:

- a. Adding a condition to waiver approval requiring the PRP to hire a public involvement consultant specifically to perform activities contained in the final Plan; and/or

- b. Conducting an audit of the site to determine whether the PRP is conducting the response action in compliance with the MCP, any waiver conditions, and/or the final Public Involvement Plan. Based on the results of the audit, DEP will determine whether waiver status for the site will be maintained or revoked.

7.0 REVISIONS TO THIS PLAN

This Public Involvement Plan may be revised as necessary during the course of the remedial response action process. If revisions are proposed, (PRP) will place copies of any proposed changes in the local information repository, and will send a notice of the availability of recommended changes to the mailing list. The (PRP) will hold a twenty-day public comment period (see Section 4.2.1 above) on the proposed revised Plan. The (PRP) will review any comments received and revise the Plan as appropriate. The final revised Plan will be placed in the information repository.

EXHIBIT I

COMMUNITY CONCERNS ABOUT THE (NAME) DISPOSAL SITE

[Summarize and list the concerns and suggestions that community members expressed when interviewed, according to the following categories.]

- A. Concerns about the nature and extent of contamination:
 -
 -
- B. Concerns about routes of exposure and neighborhood health issues:
 -
 -
- C. Concerns about the site remediation process:
 -
 -
- D. Concerns about opportunities for public involvement during the remedial response action process:
 -
 -
- E. Other Concerns:
 -
 -

EXHIBIT I

COMMUNITY CONCERNS ABOUT THE (NAME) DISPOSAL SITE

[Summarize and list the concerns and suggestions that community members expressed when interviewed, according to the following categories.]

A. Concerns about the nature and extent of contamination:

.
.

B. Concerns about routes of exposure and neighborhood health issues:

.
.

C. Concerns about the site remediation process:

.
.

D. Concerns about opportunities for public involvement during the remedial response action process:

.
.

E. Other Concerns:

.
.

III. PUBLIC INVOLVEMENT ACTIVITIES AND TECHNIQUES



II. MODEL PUBLIC INVOLVEMENT PLAN

Presented in the following pages is a model Public Involvement Plan. The model Plan must be used when developing the draft site-specific Plan.

How to Use the Model Plan

The Plan must be written according to the information provided in Section I: Public Involvement Plan Guidance Manual. The guidance must be followed to ensure that the Plan meets MCP public involvement requirements and DEP standards. When writing the Plan, the PRPs will need to refer to the model Plan. The model Plan provides DEP's required language; it must be included verbatim, unless otherwise noted as optional. **Boldface** information presented in parentheses indicates that site-specific information should be inserted in the required text. Information presented in brackets represents instructions for the author.

DRAFT PUBLIC INVOLVEMENT PLAN

(Name) Disposal Site
(DEP Site Number)
(Address, Town)

Prepared by:

(PRP name/Company)
(Address)
[list all, if more than one PRP]
(Date of document preparation)

For more information, contact:

(PRP contact person)
(Phone number)

III. PUBLIC INVOLVEMENT ACTIVITIES AND TECHNIQUES

This section presents descriptions of some of the most commonly used public involvement activities and techniques for conducting them. It is intended as a reference to be consulted when a PRP, or group of PRPs, determines that activities, in addition to those required by the MCP, are needed to address site-specific concerns. The discussion of each activity includes:

- A description of the activity;
- Its purpose;
- Techniques for conducting the activity (key points to remember);
- When to conduct such an activity in a remedial response process; and
- Benefits and limitations of the activity.

The following activities are described:

1. Fact Sheets
2. News Releases
3. Small Group Meetings
4. Telephone Hotline
5. Open Houses
6. Workshops
7. Exhibits

The key to a successful public involvement program is to target activities to the distinctive needs of the community. Therefore, not all of the activities described in this section are appropriate for every site.

=====

1. FACT SHEETS

=====

Description

A brief report, usually between two and six pages long, summarizing current or proposed activities of the site cleanup process. The fact sheet presents technical information using clear and understandable text and graphics, if appropriate.

Purpose

To help ensure that the public is informed of the status and findings of cleanup actions, and that citizens understand the issues associated with the remedial response program.

Technique

To develop fact sheets:

Identify phases during the cleanup program when fact sheets would be useful. For instance, fact sheets might be helpful:

- At the end of Phase II activities;
- At the beginning and end of Phase III activities;
and
- At the beginning and end of Phase IV activities.

For each fact sheet, identify the information to be transmitted. Types of information might include:

- A brief background on the site;
- A timetable for the proposed action(s);
- A description of the issues or problems associated with the site;
- A description of the remedial response alternatives being considered;
- The name, address, and phone number of a contact person affiliated with the PRP who will provide additional information on request; and
- The location of information repositories where material is available to the public for review.

Select a simple format for presenting the information. Avoid using highly technical language in the text.

Be concise.

=====

1. FACT SHEETS (Continued)

=====

Submit to DEP, all fact sheets prepared by the PRP and distributed to the community, local officials, or the media.

When to Conduct

Fact sheets are appropriate whenever new information pertaining to response actions is available. Fact sheets can be a particularly useful technique if distributed prior to or at a public meeting because they can provide background information which is then elaborated on at the public meeting.

Benefits/Limitations

Fact sheets are effective in briefly summarizing facts and issues involved in the cleanup process.

A poorly written fact sheet can be misleading or confusing. Fact sheets are also a one-way communication tool, and therefore should always provide the name and number of a contact person.

People will be less likely to read fact sheets consisting of a solid sheet of text than a fact sheet that has been presented with easy-to-read text and clean, simple graphics.

=====

2. NEWS RELEASES

=====

Description

Statements released to the news media that discuss current or proposed site-related actions.

Purpose

To make an official statement at milestones in the remedial response program, such as selection of a remedial response alternative, key project dates, and completion of containment or cleanup actions.

Technique

News releases can effectively and quickly disseminate information to large numbers of people. They may also be used to announce public meetings, report the results of public meetings, and to describe site activities and progress.

To prepare news releases:

Identify the relevant regional and local newspapers and broadcast media, and their deadlines.

Select the information to be communicated. Place the most important and newsworthy elements up front and present additional information in descending order of importance.

Be brief. Limit the news release to essential facts and issues.

Use simple language. Avoid the use of professional jargon and overly technical words.

Identify the entity issuing the news release. The top of the sheet should include:

- Name and address of the issuing entity;
- Release time and date;
- Name and phone number of the contact person for further information; and
- A headline summarizing the action taken.

Send copies of the release to local officials and citizen groups leaders before the release is given to the press.

=====

2. NEWS RELEASES (Continued)

=====

Submit to DEP, all news releases prepared by the PRPs and distributed to the public and press.

When to Conduct

News releases can be used when significant findings are discovered at the site, when program milestones are reached, or when schedules are delayed.

Benefits/Limitations

A news release to the local media can reach a large audience quickly and inexpensively. If the name, address, and phone number of a contact person are included, reporters (and possibly interested citizens) can raise questions about the information in the release.

Because news releases must be brief, they often exclude details in which the public may be interested. A news release should therefore be used in conjunction with other methods of communication that permit more attention to detail. A news release is not an appropriate vehicle for transmitting sensitive information.

=====

3. SMALL GROUP MEETINGS

=====

Description

Meetings of small groups held in private homes or in local meeting places at which the party or parties responsible for the site get first-hand information from interested citizens and local officials, and provide further information to the public about site issues and activities.

Purpose

To inform citizens and local officials of site activities, answer questions, and clear up any misconceptions or misunderstandings. To develop sensitivity to citizen concerns and establish rapport and a good working relationship with residents.

Technique

To conduct small group meetings:

Identify interested citizens and officials. Contact each citizen group and local agency that is directly affected by site activities, or contact key individuals who have expressed great concern regarding site activities. Offer to discuss cleanup plans at a convenient time.

Limit attendance. Restrict attendance to between 5 and 20 individuals. The larger the group, the less likely that some people will candidly express their concerns. Establishing rapport with individuals in a large group is also more difficult. If a greater number of citizens and officials are interested, schedule additional small meetings.

Select a meeting date, time, and place conducive to two-way interaction. The meeting place should have chairs that can be arranged into a circle, or some other informal setting. If citizens will not be able to meet during working hours, schedule meetings in the evening. A private home or public library meeting room may be more conducive to an exchange of ideas than a large or formal public hall. When scheduling the meeting, make sure that the date and time do not conflict with other public meetings that citizens may want to attend (for example, town council meetings), or with holidays or other special occasions.

Listen. Find out what the citizens are concerned about and what they want done. Some concerns may be met by making minor changes in the proposed action.

3. SMALL GROUP MEETINGS (Continued)

Follow-up on any major concerns. Stay in touch with the groups and contact any new groups that have formed, so that new or increasing concerns can be dealt with before problems develop.

When to Conduct

Small group meetings can be used effectively during virtually all phases of a remedial response process.

Distributing fact sheets at these meetings may also be appropriate, depending on when they are held.

Benefits/Limitations

The primary benefit of small group meetings is that they allow two-way interaction between citizens, local officials, and the PRPs. Not only will citizens be informed about the response activities but PRPs can learn how citizens view the site.

Small group meetings may require a day or more of staff time to reach a limited number of citizens.

One pitfall is that some citizens or local groups may perceive efforts to restrict the number of attendees as a "divide and conquer" tactic to prevent large groups from exerting influence on potential actions and to exclude certain individuals or groups. One way to prevent this perception is to hold additional small group meetings with those groups who express concern about being left out of the process.

Irate groups or individuals may also accuse PRPs of telling different stories to different groups at these small meetings. PRPs can avoid this criticism by inviting a cross-section of interests to each small meeting. PRPs can also keep a written record of the small group discussions and make it available upon request.

=====

4. TELEPHONE HOTLINE

=====

Description

A toll-free or local telephone number in an office of the PRP.

Purpose

To provide citizens with an opportunity to ask questions and obtain information promptly about site activities.

Technique

To install a telephone hotline, either as a "permanent" fixture, available throughout the cleanup action, or as a temporary measure, installed at the time of major project milestones:

Assign one or more staff members to handle the hotline calls. If staff are not available throughout the day, install an answering machine directing citizens to leave their names, number, and brief statement of concern, and informing them that a knowledgeable staff member will return their call promptly.

Announce the telephone hotline in news releases to local newspapers, radio stations, and television stations.

Keep a written record of each question, when it was received, and how and when it was answered.

When to Conduct

A telephone hotline would be useful during Phase II, if concern is high about site contamination or other issues. A hotline is particularly useful if any unexpected event, such as a fire or explosion, occurs at a site. A hotline can also be effective during Phase IV, when citizens may have complaints regarding environmental impacts such as excessive dust or noise.

Benefits/Limitations

A hotline can provide citizens with a relatively quick means of expressing their concerns directly to the PRPs and getting their questions answered. This quick response can help to reassure citizens that someone is listening to their concerns.

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4. TELEPHONE HOTLINE (Continued)

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Citizens calling the hotline must receive responses to their questions or concerns quickly, or they may become frustrated. If the number of calls is large, responding quickly to each inquiry could prove burdensome.

5. OPEN HOUSES

Description

An informal meeting where people can talk to PRPs on a one-to-one basis.

Purpose

To allow citizens to ask questions and express their concerns directly to PRPs.

Technique

To conduct an open house:

Select a date, time, and location for the open house that encourages attendance. Evening hours or weekends are preferable. The location should be in an easily accessible building familiar to residents (such as a public library or local meeting room).

Anticipate the number of attendees and plan accordingly. If a large number of people is expected, consider the possibility of holding two open houses to enable staff to greet and talk with each attendee.

Publicize the open house at least 2 weeks ahead of time, if possible. Send announcements to newspapers, television and radio stations, citizens on the mailing list, and any interested community organizations that publish newsletters.

When to Conduct

An open house is most appropriate when key milestones have been reached, or major decisions made.

Benefits/Limitations

The one-to-one conversations during an open house can help establish a rapport between citizens and PRPs.

Planning and conducting an open house can require a significant amount of staff time. A low turnout may not justify the effort. Hence, community interest in the site should be significant before an open house is planned.

6. WORKSHOPS

Description

Seminars or a series of meetings to discuss hazardous substance issues, and to provide information on the technical issues associated with the site and the waiver program in general.

Purpose

To improve the public's understanding of the hazardous waste problem at the site and to prevent or correct misconceptions.

Technique

To conduct a workshop:

Plan the workshop. Decide ahead of time on a minimum and maximum number of participants. If there are too few, consider holding a small group meeting instead. Identify a convenient location and time for the workshop, and set a date that does not conflict with other important meetings or interests.

Announce the workshop by publishing a notice well in advance (at least 3 weeks) in the local newspapers. Send notice of workshops with mailings to all citizens on site mailing list. Send out invitations and registration forms to interested citizens.

When to Conduct

Workshops are appropriate for presenting technical information to citizens, such as information and findings of reports required during Phase III and Phase IV.

Benefits/Limitations

Workshops provide more information to the public than is possible through fact sheets or other written materials.

Workshops can reach only a small segment of the affected populations, if only held for a limited number of people.

=====

7. EXHIBITS

=====

Description of Activity

Setting up visual displays of maps, charts, models, or photographs. These may be accompanied by a brief text explaining the displays and the purpose of the exhibit.

Purpose

To illustrate issues and proposed cleanup actions associated with hazardous waste problems in a creative and informative display. To make technical information more accessible and understandable.

Technique

To develop and display an exhibit:

Identify the target audience and the message. Possible audiences include:

- General public;
- Concerned citizens;
- Environmental groups;
- Media representatives; and
- Public officials.

Possible messages include:

- Description of the site;
- Historical background;
- Proposed remedies; and
- Health and safety effects associated with the site.

Determine where the exhibit will be set up. If the general public is the target audience, for example, assemble the exhibit in a highly visible location, such as a public library, convention hall, or a shopping center. If concerned citizens are the target audience, set up a temporary exhibit at a public meeting. An exhibit could even be as simple as a bulletin board at the site or staff trailer.

Design the exhibit and its scale according to the message to be transmitted. Include photos or illustrations. Use text sparingly.

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7. EXHIBITS (Continued)

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When to Conduct

This activity can be used during any phase of a remedial response action.

Benefits/Limitations

Exhibits tend to stimulate public interest and understanding. While a news clipping may be glanced at and easily forgotten, exhibits have a visual impact and leave a lasting impression.

Although exhibits inform the public, they are a one-way communication tool. One solution to this drawback is to attach blank postcards to the exhibit, encouraging viewers to comment or submit inquiries by mail to the PRP. Another approach is to leave the phone number of the contact who can answer questions during working hours.

IV. COMMUNITY INTERVIEW PROTOCOL

IV. COMMUNITY INTERVIEW PROTOCOL

As part of the public involvement process at waiver sites, the PRP must develop and implement a Public Involvement Plan in accordance with the Massachusetts Contingency Plan (310 CMR 40.200). This requires conducting interviews with petitioners, municipal officials, residents, local civic and environmental organizations, and any other parties that have been actively involved in site issues. Community interviews are the opportunity for PRPs to initiate dialogue with the site community and to identify community concerns. The site-specific information needed for developing the draft Plan is collected during community interviews. It is recommended that PRPs conduct community interviews in person and with no more than two PRP representatives involved.

This section presents suggested protocol for conducting community interviews.

1. Use the Notification List in the Model Plan to preliminarily identify people to be interviewed. Ask them to provide the names and phone numbers of other interested parties to be interviewed.
2. Prior to conducting the interviews, review site files and newsclippings to develop an overview of past community concerns relative to the site.
3. Contact by telephone the people to be interviewed and arrange a convenient time and place to meet. Remember that residents may only be able to meet during non-business hours and may prefer to meet in their homes. Suggest that the person to be interviewed allow at least one-half hour to an hour for the interview. Remember to include anyone interviewed on the site mailing list.
4. At the outset of the interview, introduce yourself and any colleagues and explain:
 - DEP's Public Involvement Plan process and why the PRP is preparing the Plan, your role and your colleagues roles in the process;
 - What a Public Involvement Plan is;
 - The process to present, develop, and finalize the Plan; and
 - The remedial response action process and where the site is in the process.

5. Ask people the interview questions that have been prepared in advance, as well as any followup questions to issues they raise. Remember to ask questions that will elicit the type of information that will be needed to develop the Plan. Some interview questions are listed below.
 - How did you first learn about the disposal site?
 - What is your understanding of the history of the site?
 - How long have you been involved with the site and in what way?
 - How do you get information about the site? Are there other ways which would be more convenient and useful to you?
 - Name the most useful source(s) of information about the site, and identify any individuals, groups, or media sources that you rely on for information about the site.
 - What are your specific concerns about environmental and public health issues regarding the disposal site? Investigations and cleanup activities?
 - What information would you like to receive regarding the disposal site? How often?
 - What would be the most convenient and accessible location for a site information repository?
 - Should public meetings be held during the cleanup process? If so, when?
 - What location(s) would be most convenient for public meetings about the site? When would you be most likely to attend a meeting?
 - What questions about the site or activities at the site would you like answers to during the course of the site investigation and cleanup?
 - How can communication with the community about the site be improved?
 - Are there individuals or groups that should be contacted to solicit their concerns about this site?
6. When concluding the interview, thank the people interviewed and tell them again how the information will be used. Give them your name and telephone number, and encourage them to call you if they want to contribute further information or if they have any questions. Remind them that you will provide answers for any questions they might have asked during the interviews that you could not answer.